

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

BRENDAN KELLY,

Plaintiff,

v.

**LIBERTY INSURANCE CORPORATION
D/B/A LIBERTY MUTUAL,**

Defendant.

CIVIL ACTION NO. 15-CV-00234-JL

Second Supplementary Declaration of Lavinia M. Weizel, Esq.

I, Lavinia M. Weizel, hereby declare under penalty of perjury as follows:

1. I am an attorney with the firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., counsel for Liberty Insurance Corporation.

2. I am submitting this Declaration and the Exhibits attached hereto in further support of the *Motion for Summary Judgment of Defendant Liberty Insurance Corporation* (ECF #28) and in further opposition to *Plaintiff Brendan Kelly's Motion for Summary Judgment* (ECF #27).

3. Attached hereto as **Exhibit 1** is the Second Supplementary Declaration of Lisa Duetsch, former Risk Manager for Plum Creek Timber Company;

4. Attached hereto as **Exhibit 2** is the Supplementary Affidavit of Kent Jones, Director of Accounting – Shared Services, Manufacturing and Risk Management for Plum Creek Timber, now a subsidiary of Weyerhaeuser.

5. Attached hereto as **Exhibit 3** are relevant excerpts of the Form 10-K filing of Plum Creek Timber Company, Inc. for the years 2014 and 2013.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15th day of December in the year 2016.

/s/ Lavinia M. Weizel
Lavinia M. Weizel, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2016, I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to counsel of record for the parties.

/s/ Lavinia M. Weizel